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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Computer III Further Remand
Proceedings: Bell Operating
Company Provision of Enhanced
Services

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CC Docket No. 95-20

**COMMENTS OF THE COMMERCIAL INTERNET
EXCHANGE ASSOCIATION**

Robert D. Collet
Chairman of the Board and President
Commercial Internet eXchange
Association

Ronald L. Plessner
Julie A. Garcia
Mark J. O'Connor

Piper & Marbury
1200 19th Street, N.W.
Seventh Floor
Washington, D.C. 20036
(202) 861-3900

Its Attorneys

April 7, 1995

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SUMMARY

The Commercial Internet eXchange Association ("CIX") believes that access discrimination is a very real threat to the continuing vitality of the Internet services industry. While independent service providers on the Internet can provide a myriad of new information capabilities for the public, as well as other public benefits, they cannot operate if the BOCs use their "bottleneck" access to the end users to shut out competition. The members of CIX strongly believe that they can compete with the BOCs with better service, more niche services, and better prices; however, they cannot compete if access discrimination forecloses them from offering their services on an equal footing with the BOC.

This problem requires the Commission to strengthen its safeguards. Without these safeguards market forces alone will not protect against the threat of access discrimination. Specifically, CIX recommends that the Commission revitalize the promise of ONA to reshape local networks offering fundamentally unbundled basic service elements for enhanced service providers. In addition, the review and approval process for service-by-service CEI plans must go hand-in-hand with ONA. The process of public comment, review and approval of CEI plans *before* the BOC enters the Internet service market provides Internet service providers with the best opportunity to ensure that the BOCs do not build in discriminatory practices from the start.

Finally, CIX requests that the Commission clarify that its decisions in this proceeding apply with equal force to BOC video dialtone networks.

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**COMMENTS OF THE COMMERCIAL INTERNET
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The Commercial Internet eXchange Association ("CIX"), by its attorneys, files these comments to the Notice of Proposed Rulemaking ("NPRM") released on February 21, 1995 in the above-captioned proceeding.

CIX is a non-profit organization that operates to facilitate global connectivity among commercial Internet service providers ("ISPs") throughout the world. CIX works to foster fair and open environments for Internet commercialization, and provides a forum for the exchange of experiences and ideas to enhance the vitality of the ISP industry. Its members are committed to a high standard of consumer choice and universal connectivity between ISPs.¹ CIX's 80 domestic members comprise approximately 75% of the nation's ISPs.²

CIX submits that safeguards on local exchange and access providers will best ensure the continued vitality of an independent Internet services industry. The FCC should:

¹ A list of the members is attached hereto.

² CIX also includes 40 foreign members.

1. Monitor the impact of market forces on access discrimination, especially as it affects the diversity of Internet providers;
2. Further implement the goals of open network architecture ("ONA") that allow the independent enhanced service provider ("ESP") to "pick and choose" basic service elements that maximize the ESP's service to the public;
3. Maintain the comparably efficient interconnection ("CEI") plan whereby the BOCs seek service-by-service approval through notice and comment procedures;
4. Clarify that all ONA/CEI requirements developed in this proceeding also apply to the BOCs' video dialtone services.

INTRODUCTION

CIX seeks a "level playing field" in the provision of Internet services. While the Bell Operating Companies ("BOCs") will undoubtedly become a growing force in the market for Internet services and other information services, BOC control of local access to end users imposes a serious threat of access discrimination to competitive and independent Internet service providers. CIX members are deeply concerned that the BOC's growing and enormous market incentive to discriminate, combined with the Commission's apparent relaxation of the traditional BOC access safeguards, will irreparably injure independent Internet providers to the detriment of the public.

The Commission has never before faced issues of competing Internet services of the BOCs and independent providers, and the threat of BOC access discrimination in that market. Internet access, especially commercial access, is a relatively new service, and commercial interconnection has become highly competitive only within the last few years. The rate of commercial growth has tracked CIX's own membership growth -- five years ago, CIX had five members, today CIX represents 120 commercial ISPs. Commercial Internet access has the potential to offer a panoply of enhanced services to consumers all across the country and the world, providing information, entertainment, and communications in entirely new ways.

That growth should continue as the National Science Foundation releases its "regulatory" control over the Internet. While the NSF did a commendable job in fostering and supporting the Internet for educational and scientific endeavors, its release of control creates a tremendous new universe of commercial opportunities.

These are the critical moments for the commercial Internet because it could be the proving ground for a myriad of ESPs, including Internet access providers, to enter telecommunications with a host of new services. The Internet can literally lead to an explosion of diversity, information, and commercial success.³ However, that will not be its course unless independent Internet providers are on an equal footing for access to the BOC's "bottleneck" facilities that link up Internet end users. Without regulatory safeguards, the diversity of commercial Internet enterprises will rapidly diminish. CIX strongly believes that any potential for BOC access discrimination (in combination with the BOC's marketing and integration advantages) will devastate independent Internet service providers.

A vital Internet services industry also fulfills other important public policy goals. The existence of the ISPs encourages competition with all of its attendant benefits to consumers, including innovation and the efficient provision of narrowly tailored services. In fact, ISPs are more likely to develop and provide niche services which would otherwise not be offered. The Commission must ensure equal access to the basic service elements ISPs require to offer innovative integrated services, including Internet access. Otherwise, the BOCs will have the first, best opportunity to provide integrated Internet access services to customers. To allow the BOCs such a head start would be to squash the fledgling ISP industry.

³ The Commission itself has been an active participant on the Internet. "FCC Speaks Via Internet," Compliance and Information Bureau Activities, Public Notice (February 15, 1995).

While CIX generally supports the concept of structural separations, this separation does not go far enough to realize a vibrant enhanced services marketplace. Unbundled basic service elements, with service-by-service review of each BOC's CEI plan, are also necessary.

DISCUSSION

A. Market Forces Do Not Promote Nondiscrimination.

CIX strenuously objects to the proposition, at ¶ 32 of the NPRM, that market forces, independent of the strengthened CEI and ONA protections, work to eliminate access discrimination. Respectfully, CIX believes that just the opposite is true; BOC provision of Internet access, if unchecked by adequate safeguards, may ignite discrimination in three ways.

First, as the BOCs face increased competition in the provision of local loop services, the information services area is becoming a lucrative venue for expansion and growth. CIX estimates that the U.S. market for Internet services alone is growing at a rate of 8% *per month*. CIX recognizes that BOCs have begun, and will continue, to enter and exploit the potential of this market. As they do so, they will necessarily seek every competitive advantage that the law permits. Without strong CEI and ONA protections, the BOCs will undoubtedly exploit their control over the local loop and attempt to offer inferior access to competitive ESPs.

Second, the Commission's assertion that the large ESPs, like IBM, will protect the independent industry from unchecked access discrimination by the BOCs is flawed.⁴ All ESPs, large and small alike, suffer the same difficulty from access discrimination. Even for the large ESP, the regulatory complaint process is not a viable alternative should the BOCs completely deny access, or slowly divert customers with more subtle discriminatory methods. For smaller ESPs, the Commission's complaint procedure is simply too little, too late. In short, market forces without strong regulatory safeguards will lead to an exclusion of a great many Internet service providers at the public's expense, in the form of higher, oligopoly prices and fewer service

⁴ NPRM at ¶ 33.

provider choices. In addition, if "equal access" is not actively pursued by the Commission an incalculable number of ISPs will be deterred from even entering the market.

Finally, CIX does not agree that ESPs "may find alternative ways to bypass the BOC local exchange networks entirely"⁵ using competitive access provider networks. The CAP market today in no way provides comparable access to the seamless web of institutions, schools, and residences that is offered by BOC access. Further, CIX notes that CAP networks do not, as a general matter, serve any residential customers and so, to provide service to the American home, bypassing the BOC is not an option.

In light of its inability to rely on market forces for protection, CIX supports strong ONA and service-by-service CEI requirements for all BOCs.⁶

B. CIX Supports the Unbundling Of BOC Network Elements

CIX generally supports the return to the Commission's conception of ONA as a means to achieve fundamental unbundling of the local exchange network, as promised in the Computer III, Phase I Order.⁷ The Ninth Circuit correctly identified the problem with the FCC's current ONA model: "competitors who otherwise would be able to compete effectively by offering more efficient packages of [basic] services had fundamental unbundling been accomplished might be excluded from the market entirely."⁸

⁵ NPRM at ¶ 33.

⁶ CIX urges the Commission to consider the imposition of ONA/CEI requirements, as discussed herein, on all providers of local exchange service that compete with or replace the traditional LEC operator services. As new providers of basic local service emerge, regulatory parity and the public interest in a competitive ESP industry demand that discrimination safeguards apply to all local *basic* service providers.

⁷ Third Computer Inquiry, Report and Order, 104 F.C.C.2d 958 (1986), recon. 2 F.C.C. Rcd. 3035 (1987); further recon., 3 F.C.C. Rcd. 1135 (1988); second further recon., 4 F.C.C. Rcd. 5927 (1989); vacated, California v. FCC, 905 F.2d 1217 (9th Cir. 1990); Computer III Remand Proceedings, 5 F.C.C. Rcd. 7719 (1990) (ONA Remand Order); recon., 7 F.C.C. Rcd. 909 (1992); pets. for review denied, California v. FCC, 4 F.3d 1505 (9th Cir. 1993); Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier 1 Local Exchange Co. Safeguards, 6 F.C.C. Rcd. 7571 (1991) (BOC Safeguards Order); vacated in part, California v. FCC, 39 F.3d 919 (9th Cir. 1994).

⁸ California v. FCC, 3 F.3d 919, 929 (9th Cir. 1994) ("California III").

ONA was supposed to give competing ESPs the ability to use as "building blocks"⁹ basic service elements in different ways from the BOCs' own enhanced service offerings. By designing efficient transport systems using the BOC BSEs, the ESP can provide low-cost services to the public. CIX submits that this is a worthy goal, and it merits more protection than the current ONA model.¹⁰ In conjunction with ONA, a service-by-service CEI plan is necessary to ensure that BOCs do not use the current ONA regime to unfairly disadvantage independent ESPs, particularly for BOC service offerings on the Internet.

C. Comparably Efficient Interconnection Approval on a Service-By-Service Basis Creates Fairness and Efficient Provision of Enhanced Services

CIX supports strong CEI requirements for all enhanced services offered by the BOCs. While ONA is an important goal, CEI ensures that the Commission, the public, and the independent ESP providers have ample opportunity to review the "equal access" plan. For CIX, this process would allow the independent Internet provider industry to review BOC plans for interconnection with the Internet. Given the tremendous potential for unfair and harmful access discrimination, the commercial Internet industry should not be married to any one particular ONA plan, which might have been approved years before the commercial Internet was even a reality. Service-by-service CEI plans can best ensure that new entrants, especially those on the Internet, are not foreclosed from participating in the process of ensuring "equal access" to the local basic service network.

Two examples demonstrate how the BOCs could use new transport technologies to impose access "inequality" for independent ISPs. First, by integrating carrier signaling with ISP services, a BOC can provide the customer a nearly instantaneous Internet connection. As soon as

⁹ BOC Safeguard Order, 6 FCC Rcd. 7571, 7598 (1991).

¹⁰ For example, the nondiscrimination reporting requirements developed for the current ONA offers no opportunity for independent input. These reports reflect post-installation of BSEs by the BOCs, they are not a vehicle for ensuring that the BOCs install and develop BSEs that meet the needs of independent ESPs. In effect, this process now limits what one can "pick and choose" to what the BOC offers, without any opportunity for comment until after the BSEs are already in place.

the user desires access, e.g., "clicking" an icon on a PC or a TV, the signaling system of the carrier's bearer network can immediately allocate a channel or circuit from the user to the carrier's Internet access facilities. Without access to these basic service elements, the independent ISP is relegated to offering its end users a slower, less convenient, service.

A second example involves LAN-like bearer networks. LAN-like technology is very attractive to the BOCs because of its ability to deliver inexpensively high bandwidth (ethernet: 10 mbps, FDDI: 100 mbps). However, the emerging LAN-like bearer network services (e.g., ethernet or FDDI) are not amenable to equal access because sharing these media among ISPs is not feasible, due to their inability to scale to large numbers of attachments.

Effective CEI requirements would require a BOC to implement the LAN-like bearer service as a virtual service over switched facilities that can scale to a large number of attachments and multiple ESPs (e.g., SMDS).

The best way to guard against access discrimination is to require BOCs to submit service-by-service CEI plans for prior FCC approval. This CEI process has been in place for some enhanced services for several years now, as first implemented in the Computer III, Phase I Order.¹¹ As the Commission noted in the NPRM, the results of this process have effectively reduced access discrimination problems.¹² The success of the CEI plans argue for the continued use of that regime. The use of service-specific CEI plans is particularly important to emerging industry, because it provides notice of changes relevant to the industry. The independent Internet access industry barely existed when the BOCs submitted initial CEI and even ONA plans, and it did not participate in any Commission proceedings to protect its access rights. CEI plans will ensure the fairest, most efficient, and least contentious method of providing equal access.

¹¹ Computer III, 104 F.C.C.2d at 1020.

¹² NPRM at ¶ 29.

Further support for the CEI regime comes from the BOCs, who recently requested that the Commission reinstate the service-by-service CEI plan regime pending the outcome of this proceeding.¹³ CIX submits that there is no good reason to alter this framework. Service-by-service CEI plans do not materially burden the BOCs.¹⁴ Even under the BOC Safeguard Order, the BOCs are required to provide CEI as a part of the ONA structure.¹⁵ Thus, the BOC will likely have developed a plan for ESP access when it introduces new enhanced services. The only burden to the BOC is filing that plan at the Commission, and the time for regulatory approval, which may be expedited.¹⁶

This incidental burden is a small price to pay to ensure that the information services industry is competitive and access is afforded to all service providers.¹⁷ Further, based on the number of service-specific CEI plans approved to date, the BOCs face no substantial difficulty in getting their CEI plans approved, therefore the FCC imposes no permanent roadblocks to market entry.¹⁸ CIX maintains that CEI plans have been approved in the past because the threat of

¹³ Bell Operating Companies' Joint Petition for Waiver of Computer II Rules, Memorandum Opinion and Order, 76 RR 2d 1536 (1995).

¹⁴ We also note that the Commission has held that its own administrative burden associated with service-by-service CEI is not excessive. BOC Safeguard Order, 6 FCC Rcd. at 7622.

¹⁵ See, Id. at 7600, n. 106 (Under ONA scheme, BOCs must provide "comparable technical access" according to CEI parameters.).

¹⁶ See, Phase I Reconsideration Order, 2 FCC Rcd. 3035, 3045 (1987).

¹⁷ As the Commission has observed, "[u]nder CEI plans, the BOCs have participated to a much greater degree in providing enhanced services than under structural separation. For instance, under CEI plans or market trials, the BOC's have provided, or sought to provide, voice mail service, E-Mail, gateways, electronic data interchange, data processing voice store-and-forward, and fax store-and-forward services." BOC Safeguard Order, 6 FCC Rcd. at 7619.

¹⁸ See, e.g., U.S. West, Inc., Memorandum Opinion and Order, 4 FCC Rcd. 572 (CCB 1989); BellSouth, Memorandum Opinion and Order, 3 FCC Rcd. 7284 (CCB 1988); Southwestern Bell Telephone Co., Memorandum Opinion and Order, 3 FCC Rcd. 6912 (CCB 1988).

denial forced the BOCs to present plans that largely provided equal access.¹⁹ Without this proactive regulatory review process, and the accompanying possibility of Commission rejection of inadequate CEI plans, the BOCs will face tremendous market pressure to deny access in the short run. Although they may eventually be forced to provide equal access via the FCC complaint process, the BOCs will gain the competitive advantage long before the complaint process has run its course. While that may be best for the BOC, it undermines equal access and a truly competitive enhanced services market.

In short, service-by-service CEI requirements can bring about "equal access" more effectively than total reliance on the Commission's complaint process. The Commission indicated in its NPRM, at para. 29, that "no formal complaints have been filed at the FCC" since the mid-1986 Computer III Phase I Order.²⁰ This dearth of formal complaints, however, is not evidence that the nonstructural safeguards have been a success, nor is it a guarantee that BOCs with ONA plans will not discriminate against ESPs. The fact that not a *single* complaint has ever been filed may indicate a problem with the complaint process, not that the current reliance on ONA plans and complaints has led to perfect access. Moreover, several compelling reasons exist as to why small ESPs hesitate to file formal complaints against the BOCs. Initially, the ESP is usually economically dependent upon its ongoing amicable business relationship with the BOC. The hallmark of this relationship is the inherent inequality in bargaining power of the parties. An ESP must maintain relations with the BOC, whereas the BOC can easily replace an ESP. In addition, by the time an ESP may file a formal complaint (after developing a new service, petitioning the BOC for equal access, receiving denial of its request), its window of

¹⁹ As the Commission observed, the service-by-service CEI plan "process will provide incentives for . . . the BOCs to present well formulated CEI plans that comply with our requirements from the start." Phase I Reconsideration Order, 2 FCC Rcd. at 3045.

²⁰ 104 F.C.C. 2d 958 (1986).

opportunity may have passed and it may be no longer economically practical to pursue that particular service.²¹

Finally, maintaining the service-by-service CEI plan process comports with the concerns raised by the Ninth Circuit. The Court found that "the BOCs have the incentive to discriminate and the ability to exploit their monopoly control over the local networks to frustrate regulators' attempts to prevent anti-competitive behavior."²² The Commission has determined that anti-competitive incentive also exist with the introduction of new services.²³ One way to address the Court's concern is to adopt additional protective measures. Pre-approval of CEI plans can provide this additional protection against access discrimination without forcing a change in the Commission's basic concept of evolutionary ONA.

D. Video Dialtone Should Be Subject to The Same CEI/ONA Safeguards

CIX requests that the Commission clarify that the rules adopted in this proceeding apply with full force to the deployment of BOC video dialtone networks and the provision of enhanced services, both video and non-video, over those networks. See Memorandum Opinion and Order on Reconsideration and Third Further Notice of Proposed Rulemaking, 76 RR 2d 740, 788 (1994) ("We also affirm the Commission's decision to apply existing enhanced service safeguards to BOC and GTE provision of nonregulated level-two video dialtone services. . . . The fact that video dialtone is a new service does not lessen the possibility of discrimination,

²¹ The Commission has given the BOCs a 120-day period in which to respond to requests for a new capability. See BOC ONA Order, 4 F.C.C. Rcd 1, 205-06, ¶ 397 (1988); BOC ONA Amendment Order, 5 F.C.C. Rcd 3103, 3117, ¶ 124 (1990); BOC ONA Further Amendment Order, 6 F.C.C. Rcd at 7654-56, ¶¶ 14-19 (1991). The Commission does not require that the BOC provide the capability within that time frame, merely that it responds to the request, setting a future date for the provision of access and estimating the cost of the access. *Id*

²² California III, 3 F.3d at 929.

²³ For example, the threat of access discrimination on video dialtone is very real in light of the LEC's current market power in non-video services. See Memorandum Opinion and Order on Reconsideration and Third Further Notice of Proposed Rulemaking, 76 RR 2d 740, 788 (1994) ("The fact that video dialtone is a new service does not lessen the possibility of discrimination, particularly since the BOCs and GTE may well use their video dialtone systems for video and non-video services and in light of their continuing market power in non-video services.").

particularly since the BOCs and GTE may well use their video dialtone systems for video and non-video services and in light of their continuing market power in non-video services.").


CONCLUSION

The decisions made in this proceeding will determine whether this country receives on-line information from a multitude of competing providers or an oligopoly of facilities-based carriers that have managed to exclude all competition from access to the end user. CIX urges the Commission to work toward ensuring the former vision of a competitive and diverse ESP marketplace. Only by ensuring nondiscriminatory access with strong CEI and ONA will the Commission facilitate the proliferation of competitive enhanced services responsive to the largest diversity of consumers and citizens.

Respectfully submitted,

COMMERCIAL INTERNET EXCHANGE
ASSOCIATION

Robert D. Collet
Chairman of the Board and President
Commercial Internet eXchange
Association


Ronald L. Plessner
Julie A. Garcia
Mark J. O'Connor

Piper & Marbury
1200 19th Street, N.W.
Seventh Floor
Washington, D.C. 20036
(202) 861-3900

Its Attorneys

Date: April 7, 1995

WHAT NETWORKS ARE MEMBERS OF CIX?

Last Updated: April 3, 1995

- o 2020Net - Virginia & Washington D.C.
- o Able Tech - San Jose, California
- o Advantis - National U.S.
- o Agate Internet Services - Bangor, Maine
- o Aimnet - California
- o Allied Access - Illinois
- o AlphaNet - Wisconsin
- o AlterNet - National U.S.
- o ANS CO+RE Systems, Inc. - National U.S.
- o Apex Global Info Systems - Michigan
- o Ashton Communications - Mexico & Southwest U.S.
- o Asociados Espada C.A. - Venezuela
- o Aurora.Net - Canada
- o a2i Communications - San Francisco Bay Area
- o BARRNet - Northern California
- o Berbee Information Networks - Wisconsin
- o Best Internet Communication - California
- o British Telecom - United Kingdom
- o Bull HN Information Systems Inc. - Massachusetts
- o CA*net - Canada
- o Cable&Wireless, Inc. - Virginia
- o Capcon Library Network - Virginia, Maryland
- o CentNet - Boston Area
- o CERFnet - West Coast U.S.
- o Commonwealth Telephone Company - Pennsylvania
- o Communique - New Orleans, Louisiana
- o Compuserve - National U.S. & International
- o Connect.Com.au - Australia
- o ConnectedNet - Washington State
- o CRL - National U.S.
- o Crocker Communications - Greenfield, Minnesota
- o Crossroads Communications - National U.S.
- o CS & W, Inc. - Minnesota
- o Cybergate - Florida, Southeast U.S.
- o Cyberstore Systems - Canada
- o DataBank - Kansas
- o DataXchange - Florida
- o Dayton Network Access Company - Ohio
- o Demon INTERNet - United Kingdom
- o Destek Group, Inc. - Northern New England
- o Digital Express Group - East Coast, U.S.
- o DirectNet Corp. - National U.S.
- o ElectriCiti, Inc. - San Diego, California
- o Electro-Byte Technologies - Canada
- o EMI Communications - New York Area
- o EskimoNet - Western Washington State
- o EUNet - Europe
- o Euronet Internet - Europe
- o EZnet - New York
- o FIBRCOM - Southern U.S. and Mexico
- o Fibernet - National U.S.
- o Fujitsu - Japan
- o Global Enterprise Services/JvNCNet - National U.S.
- o Globalcenter.Net - National U.S. and Canada
- o HiNet - Taiwan
- o HLC-Internet - National U.S.
- o HoloNet - National U.S. and Canada
- o Hong Kong Supernet - Hong Kong
- o HookupNet - Canada
- o HTP Services - New York, Long Island
- o I-2000 - New Jersey, New York City, Long Island and Connecticut
- o IDT - New Jersey
- o Iij - Japan
- o I-Net Technologies - Korea
- o Ichthus Access Networking - West Virginia and Southern Ohio
- o Infinite Access, Inc. - Florida
- o InfoTek - South Africa
- o INS Info Services - Iowa/Midwest
- o INSINC - New Jersey
- o INTAC Access Corporation - Northeast U.S.
- o InterCon - Japan
- o Intermind Corp. - Nevada
- o Internet Atlanta, Inc. - Southeast U.S.
- o Internet Exchange Europe - Netherlands
- o The Internet Mainstreet - San Francisco Bay Area, California
- o Internet Media Network, Inc. - Southern CA.
- o Internet Oklahoma - Oklahoma
- o Internet Public Access Corp. - San Jose, California
- o The Internet Solution - South Africa
- o Internet Technology Systems - Rocky Mountain U.S.
- o Internetworks, Inc. - Northwest U.S.
- o Interpath - Southeast U.S.
- o ITnet - Italy
- o IUnet - Italy
- o Jax Gateway to the World - Florida
- o JC Information Systems - California

- o Kokusai Denshin Denwa Co.,Ltd. - Japan
- o Kornet - Korea
- o Lincoln Telephone & Telegraph - Nebraska
- o Logical Net - New York
- o LYNX - Bermuda
- o MagicNet - Southern California
- o MCI - National U.S. & International
- o MISNET - Kentucky
- o MV Communications - New Hampshire
- o Nando.net - Raleigh, North Carolina
- o NEARNET - New England
- o NEC - Japan
- o NETCOM - National U.S.
- o NetNet, Inc. - Wisconsin
- o NetVision - Israel
- o New York Net - New York
- o Nordic Carriers - Scandinavia
- o NorthWestNet - Northwest U.S.
- o Open Business Systems - Illinois
- o Packet Works, Inc. - Florida
- o Pilot Network Services - San Francisco Bay Area
- o PIPEX - United Kingdom
- o Portal Communications - San Francisco Bay Area
- o PSINet - National U.S. and Japan
- o RACSAnet - Costa Rica
- o RGNet - Oregon/California
- o Singapore Telecom - Singapore
- o Sovam Teleport - Russia
- o SP Telecom - Western U.S.
- o SpinNet (AT&T Jems) - Japan
- o SprintLink - National U.S.
- o STARnet - St. Louis, Missouri
- o Sun Microsystems Inc. - National U.S.
- o SURAnet - Southeast U.S.
- o Synergy Communications - National U.S.
- o Tachyon Communications Corp. - Florida
- o TCHUldata - Kenya, Africa
- o Tech net - Singapore
- o THEnet - Texas
- o ThoughtPort - National U.S.
- o TICSA - South Africa
- o TogetherNet - Vermont and New York City
- o Tokai Communication Platform Network(TCP-Net) - Japan
- o TokyoNet - Japan
- o TOPNET - Netherlands
- o Total Connectivity Providers - United Kingdom Services, Ltd. - Israel
- o Treadline Information and Communication
- o TWICS Kabushiki Kaisha - Japan
- o USIT - Tennessee
- o VISTAnet - Vermont
- o West Publishing Corporation - Minnesota
- o Wis.com - National U.S.
- o Wyoming.com - Wyoming
- o xs4all - Europe

Additional networks are joining each month.

CERTIFICATE OF SERVICE

I, Gail Brosious, a secretary for the law firm of Piper & Marbury, hereby certify that on this 7th day of April, 1995, a copy of the "Comments of the Commercial Internet eXchange Association" was served via hand delivery upon the following :

Peggy Reitzel
Policy and Program Planning Division
Common Carrier Bureau
Room 544
1919 M Street, N.W.
Washington, D.C. 20554

International Transcription Services, Inc.
2100 M Street, N.W.
Suite 140
Washington, D.C. 20554

In addition, the original and nine copies of the "Comments of the Commercial Internet eXchange Association" were filed via hand delivery upon William F. Caton, Acting Secretary, Federal Communications Commission, 1919 M Street, Room 222, Washington, D.C. 20554.



Gail Brosious